

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**JOE SHIELDS on behalf of himself and others similarly situated** §  
§

**VS.**

ULTIMATE VACATION GROUP LLC	\$
d/b/a ROYAL BAHAMAS CRUISE LINE,	\$
CARIBBEAN CRUISE LINE, INC.,	\$
CELEBRATION CRUISES	\$
INTERNATIONAL LIMITED CORP.	\$

**CASE NO. 3:14-CV-00285**

**JUDGE GEORGE HANKS, JR.**

**JOINT MOTION TO DISMISS DEFENDANT ULTIMATE VACATION GROUP, LLC  
D/B/A ROYAL BAHAMA CRUISE LINE WITH PREJUDICE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

JOE SHIELDS, Plaintiff, and ULTIMATE VACATION GROUP, LLC D/B/A ROYAL BAHAMA CRUISE LINE (“Ultimate”), Defendant, files this their Joint Motion to Dismiss Defendant Ultimate Vacation Group, LLC d/b/a Royal Bahama Cruise Line with Prejudice, and would respectfully show the Court as follows:

1. Plaintiff no longer wishes to pursue his claims made in his pleadings and motions against Defendant Ultimate Vacation Group, LLC d/b/a Royal Bahama Cruise Line.

2. For this reason, Plaintiff and Ultimate jointly move this Court for entry of an order whereby all of Plaintiff's claims and causes of action against Defendant Ultimate Vacation Group, LLC d/b/a Royal Bahama Cruise Line are dismissed with prejudice to the re-filing of same.

WHEREFORE PREMISES CONSIDERED, Plaintiff Joe Shields and Defendant Ultimate Vacation Group, LLC d/b/a Royal Bahama Cruise Line jointly and respectfully request that the Court grant this Joint Motion to Dismiss Defendant Ultimate Vacation Group, LLC d/b/a Royal Bahama Cruise Line with Prejudice, enter an Order whereby all of Plaintiff's claims and causes of action against Defendant Ultimate Vacation Group, LLC d/b/a Royal Bahama Cruise Line are dismissed with prejudice to the re-filing of same, and for such other and further relief to which they may be entitled.

Respectfully submitted,

By: /s/ **David E. Wynne**

David E. Wynne  
Attorney-in-Charge  
State Bar No. 24047150  
Federal Bar No. 566468  
dwynne@wynne-law.com  
1021 Main Street, Suite 1275  
Houston, Texas 77002  
Telephone: (713) 227-8835  
Facsimile: (713) 227-6205

OF COUNSEL:

**WYNNE & WYNNE LLP**

Kenneth R. Wynne  
State Bar No. 22110000  
Federal Bar No. 837  
kwynne@wynne-law.com  
1021 Main Street, Suite 1275  
Houston, Texas 77002  
Telephone: (713) 227-8835  
Facsimile: (713) 227-6205

**ATTORNEYS FOR PLAINTIFF  
JOE SHIELDS**

By: /s/ **Jason Wagner**

Jason Wagner  
Attorney-in-Charge  
State Bar No. 00795704  
Federal Bar No. 20325  
jwagner@wsdllp.com  
1010 Lamar Street, Suite 425  
Houston, Texas 77002  
Telephone: (713) 554-8450  
Facsimile: (713) 554-8451

OF COUNSEL:

**WAGNER SÁENZ DORITY, L.L.P.**

Jeremy Saenz  
State Bar No. 24033028  
Federal Bar No. 36212  
jsaenz@wsdllp.com  
1010 Lamar Street, Suite 425  
Houston, Texas 77002  
Telephone: (713) 554-8450  
Facsimile: (713) 554-8451

**ATTORNEYS FOR DEFENDANT  
ULTIMATE VACATION GROUP LLC  
D/B/A ROYAL BAHAMA CRUISE  
LINE**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Joint Motion to Dismiss Defendant Ultimate Vacation Group, LLC d/b/a Royal Bahama Cruise Line with Prejudice** was served, pursuant to Federal Rule of Civil Procedure 5, via ECF, on this the 11th day of August, 2015, to:

Jason Wagner  
Wagner Saenz DORITY, L.L.P.  
1010 Lamar Street, Suite 425  
Houston, Texas 77002  
Facsimile: (713) 554-8451  
Email: jwagner@wsdllp.com  
(Attorneys for Ultimate)

Richard Epstein & Jeffrey Backman  
Greenspoon Marder, P.A.  
200 East Broward Boulevard, Suite 1800  
Fort Lauderdale, Florida 33301  
Facsimile: (954) 213-0140  
Email: richard.epstein@gmlaw.com and [jeffrey.backman@gmlaw.com](mailto:jeffrey.backman@gmlaw.com)  
(Attorneys for Cruise Line Defendants)

/s/ Jason Wagner  
Jason Wagner